Newell Rubbermaid
Brands That Matter

Baby & Parenting
Essentials

March 20, 2013

Via Electronic Mail

D. Scott Yon, Chief
Vehicle Integrity Division
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: REVISION to Graco response to NHTSA Preliminary Evaluation PE12-031

Dear Mr. Yon:

Graco Children's Products, Inc. (Graco) has become aware of an inaccuracy in our response letter to the Preliminary Evaluation PE12-031 submitted on December 21, 2012. The Step 2 child restraint model is not within the scope of the evaluation and should be deleted from the response letter. Consequently, a revised page 3 will be submitted that deletes the reference to the Step 2 model.

Sincerely,

David Galambos
Senior Regulatory Manager
Graco Children's Products, Inc.

cc: Sean Beckstrom - Vice President, Legal Affairs, Newell Rubbermaid - Baby & Parenting Essentials
Dan Campbell – Crowell & Moring

PE12-031

GRACO

3-20-2013

UPDATE PAGE 3 TO GRACO 12-31-2012

release the tongues. The Signature Buckle release button is a sliding button and must be depressed downward toward the crotch webbing in order to release the tongues.

Graco initially utilized the Signature Buckle design on many 2009 models. This proprietary buckle design was created as a joint effort between AmSafe and Graco. The Signature Buckle was used exclusively on Graco child restraints. Graco later introduced the QT Buckle design on its child restraints. The QT Buckle was developed by AmSafe and is commercially available to other child restraint manufacturers. Graco believes that other manufacturers use, at least a version of, the QT Buckle on commercially available products.

As you will see from this response, Graco has been keenly aware of the issue being investigated by NHTSA. This issue is a consumer frustration and a consumer experience that Graco has been working to improve. However, Graco has no reports of any injury or evidence of degradation in crash performance nor does it believe at this time that there is any safety issue. Graco has collected the necessary information as requested by NHTSA and provides the following response to each of the requested items.

1. State the number of all subject child seats Graco has manufactured, or imported for sale, in the United States, by model number and model year. Provide the data by monthly production volumes in a table in Microsoft Access 2010, or a compatible format (e.g., Excel), entitled "PRODUCTION DATA."

   Graco's Response:

   Graco provides the number of child restraints manufactured from January 1, 2009 through October 2012 for the child restraint models that utilize the Signature and QT buckles as shown in **Attachment 1 – PRODUCTION DATA**. The child restraint models that have utilized the Signature and QT buckles include the following:

   Nautilus and derivative models Nautilus Elite and Argos 70
   MyRide 65 and derivative models MyRide 65 with Safety Surround and MyRide 70
   Comfort Sport and Classic Ride 50
   Size4Me
   CozyCline
   SmartSeat
   Snugride and Snugride 22
   Snugride 30
   Snugride 32
   Snugride 35
   Step 1 Safe Seat
   Snugride Click Connect 40

2. State the number of each of the following, received by Graco, or of which Graco is otherwise aware, which relate to, or may relate to, the alleged defect in the subject child seats: